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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EFFAT S. EMAMIAN

Plaintiff,

-against-

ROCKEFELLER UNIVERSITY,

Defendant.

Civil Action No.
07 CV 3919 (DAB)

**NOTICE OF MOTION
TO DISMISS THE SEVENTH
AND EIGHTH CLAIMS OF
THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Seventh and Eighth Claims of the Amended Complaint and the Declaration of Bettina B. Plevan and the exhibit thereto, Defendant will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York 10007 at a

date and time to be set by the Court, for an order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing Plaintiff's Complaint in part and for such other relief as this Court may deem just and proper.

Dated: New York, New York
August 10, 2007

PROSKAUER ROSE LLP

By: /s/ Bettina B. Plevan
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